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9 Attorney for Plaintiffs

10 IN THE UNITED STATES DISTRICT COURT  
11 FOR THE  
12 NORTHERN MARIANA ISLANDS

13 LI YING HUA, LI ZHENG ZHE and XU JING JI, ) CASE NO. CV 05-0019

14 Plaintiffs, )

15 vs. )

16 JUNG JIN CORPORATION, a CNMI corporation, )  
17 ASIA ENTERPRISES, INC., a CNMI corporation, )  
18 PARK HWA SUN, KIM HANG KWON, )  
19 KSK CORPORATION, a CNMI corporation, )  
20 and KIM KI SUNG, )

21 ) SECOND AMENDED  
22 ) NOTICE OF RULE 30(b)(6)  
23 ) DEPOSITION OF KSK CORP.  
24 )

25 Defendants. )

26 TO: KELLEY M. BUTCHER, ESQ.

27 Attorney for Defendants KSK CORPORATION and KIM KI SUNG

28 PLEASE TAKE NOTICE that, pursuant to Rules 26, 28 and 30 of the Federal Rules of Civil  
29 Procedure, on Wednesday, April 9, 2008, at the hour of 10:00 a.m. at the law office of Mark B.  
30 Hanson, Second Floor, Macaranas Building, Beach Road, Garapan, Saipan, Commonwealth of the  
31 Northern Mariana Islands, Plaintiffs' attorney will take the deposition of Defendant KSK  
32 CORPORATION, PMB 234, P.O. Box 10,001, Saipan, MP 96950 ("KSK"), said deposition to  
33 continue from day to day until completed. Such deposition will be taken upon oral examination for  
34 the purpose of discovery, or as evidence, or both, pursuant to the Federal Rules of Civil Procedure,  
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1 before the undersigned who will administer the oath and shall be the officer before whom the  
2 deposition is taken as that term is used in Fed. R. Civ. P. 28(a).

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4 Pursuant to Rule 30(b)(6), KSK shall, as known or reasonably available to it, designate and  
5 produce for deposition one or more of the KSK's officers, directors, employees, managing agents,  
6 consultants, auditors or other persons who consent to testify on KSK's behalf as to the subject  
7 matters identified below for the time period from November 2002 through the date of the deposition  
8 noticed hereunder including any continuance thereof (unless otherwise stated):

- 9 1. The review of documents in the possession, custody or control of KSK and the preparation a  
10 the response thereafter to Plaintiffs' First Request for Production of Documents to KSK;
- 11 2. The substance of the documents produced by KSK in response to Plaintiffs' First Request for  
12 Production of Documents to KSK;
- 13 3. The lending of money by KSK to anyone within the time period stated above, including the  
14 preparation and execution of all documentation thereof;
- 15 4. The borrowing of money by KSK from anyone within the time period stated above, including  
16 the preparation and execution of all documentation thereof;
- 17 5. The substance of the document attached hereto as Exhibit "A";
- 18 6. The nature and extent of any interest KSK has or previously had in any business entity,  
19 whether a sole proprietorship, partnership, corporation, limited liability company, or any non-  
20 profit association or corporation or any other business entity, that has or had any part of its  
21 operations in the Commonwealth of the Northern Mariana Islands at any time from January  
22 2000 through the date of the deposition noticed hereunder including any continuance thereof;
- 23 7. The substance of KSK's bank records and the keeping of its bank accounts, generally and with  
24 respect to periodic deposits and withdrawals therefrom;
- 25 8. The substance of KSK's tax records and the preparation of all tax returns filed by KSK with

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1 any government agency;

2 9. The hiring, firing and employment of any employees of KSK, including Defendant Kim Ki

3 Sung;

4 10. All information disclosed in KSK's "Rule 26 Discovery Disclosures" and any supplements

5 thereto up to and including the day of the deposition noticed hereunder including any

6 continuance thereof;

7 11. All responses to any additional discovery served by Plaintiffs on Defendants, or any of them,

8 prior to the day of the deposition noticed hereunder including any continuance thereof;

9 12. Plaintiffs' allegations in their Second Amended Verified Complaint;

10 13. Defendants' Answer to Plaintiffs' Second Amended Verified Complaint and the factual basis

11 for the affirmative defenses contained therein;

12 14. The relationships of the other defendants in this case to KSK, including but not limited to any

13 stock ownership, officer, director or manager positions, dates of stock ownership,

14 appointment, election, and/or employment, their duties and responsibilities, and their

15 authority to enter into agreements on behalf of KSK or otherwise bind KSK by their actions;

16 15. The operations, income and expenses of KSK; and

17 16. The assets of KSK including, but not limited to any actual or intended disposition of such

18 assets.

19 Pursuant to the provisions of Fed. R. Civ. Pro. 30(b)(2), you are hereby notified that the

20 deposition shall be recorded by video tape and digital voice recorder rather than stenographic means.

21 You are invited to attend and cross-examine.

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1 DATED this 3<sup>rd</sup> day of April, 2008.  
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4 /s/ Mark B. Hanson  
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6 MARK B. HANSON  
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15 Attorney for Plaintiffs  
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1 CERTIFICATE OF SERVICE

2 I hereby certify that a copy of the foregoing will be deposited in the United States Post Office,  
3 first class mail, postage prepaid, addressed to the following:

4  
5 Jung Jin Corporation  
P.O. Box 503428  
6 Saipan, MP 96950  
(670) 235-4321

Park Hwa Sun  
P.O. Box 503428  
Saipan, MP 96950  
(670) 235-4321

7 Asia Enterprises Inc.  
P.O. Box 503448  
8 Saipan, MP 96950  
(670) 235-4321

Kim Hang Kwon  
P.O. Box 503448  
Saipan, MP 96950  
(670) 235-4321

10 I further certify that the following were served with a copy of the foregoing via the Court's  
11 electronic case filing system and via e-mail:

12  
13 G. Anthony Long  
Kelley M. Butcher  
14 LAW OFFICES OF G. ANTHONY LONG  
P.O. Box 504970  
15 Saipan, Mariana Islands 96950  
E-mail: gal@nmilaw.com  
kmb@nmilaw.com

16  
17  
18 DATED: April 3, 2008 /s/ Mark B. Hanson  
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MARK B. HANSON